

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
WILLIAM MARTIN BAKER,)
TIMOTHY ALAN BAKER, and)
KB FREEDOM PROPERTIES, L.L.C.)
Defendants.)

CIV-18-817-D

COMPLAINT

The United States of America, by and through the First Assistant U.S. Attorney for the Western District of Oklahoma, Robert J. Troester, and Assistant United States Attorney, Kay Sewell, alleges upon information and belief as follows:

NATURE OF ACTION

1. This is a civil action brought by the United States pursuant to the Fair Debt Collection Procedures Act, 28 U.S.C. §§ 3301-3308, (the “FDCPA”) against the Defendants William Martin Baker (“William”), Timothy Alan Baker (“Timothy”) and KB Freedom Properties, L.L.C. (collectively, “Defendants”), to set aside, as a fraudulent conveyance, the conveyance of real property located in Oklahoma County, State of Oklahoma, to wit:

Lot Eight (8), Block Four (4), L.L. LYON SKYLINE VIEW ADDITION, Oklahoma City, Oklahoma County, Oklahoma, according to the recorded plat thereof, LESS AND EXCEPT one-half (1/2) interest in and to all of the oil, gas and other

minerals in and under and that may be produced from said premises which have previously been conveyed.

commonly known as 4029 NW 33rd Street, Oklahoma City, Oklahoma 73112 (the “Property”), by William to Timothy. The United States seeks judgment from this Court to the extent necessary to satisfy the debt owed to it by William arising from the Amended Judgment in a Criminal Case (Doc. 435) entered in *United States of America v. Gum, et al.*, Case No. CR-15-126-003 (W.D. Okla. filed Mar 5, 2018). (hereinafter, “*US v Gum*”) Exhibit 1. *Amended Judgment in a Criminal Case filed March 5, 2018.*

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345.
3. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) because a Judgment in a Criminal Case was entered in the Western District of Oklahoma in the amount of \$635,257.00 *US v Gum*, Docket Sheet, Doc. 435. The Amended Judgment in a Criminal Case is based on events that occurred in the Western District of Oklahoma.

THE PARTIES

4. Plaintiff is the United States of America.
5. Defendant, William Martin Baker is an individual and convicted felon currently serving a 24-month federal prison sentence at MCFP Springfield, a security federal medical center, 1900 W. Sunshine Street, Springfield, MO 65807.
6. Defendant, Timothy Alan Baker, is an individual and a resident of the state

of Oklahoma, domiciled at 4029 NW 33rd Street, Oklahoma City, OK 73112.

7. KB Freedom Properties, L.L.C. is a limited liability company registered to do business in the State of Oklahoma.

FACTUAL BACKGROUND

8. On June 16, 2015, an Indictment was filed under seal against William and others. *US v Gum*, Docket Sheet, Doc. 1.

9. On March 5, 2018, an Amended Judgment in a Criminal Case was entered against William for violation of 18 U.S.C. § 1594(c), conspiracy to sex traffic a child. *US v Gum*, Docket Sheet, Doc. 435. The Defendant was ordered to pay as his criminal monetary penalty, the amount of \$635,347.00 with interest.

10. As of August 21, 2018, a debt of \$641,539.08 remains unpaid and due and owing from Defendant, William Martin Baker.

11. KB Freedom Properties, L.L.C. may claim some interest to the subject property but any such interest is inferior to that of the United States.

PURCHASE AND CONVEYANCE OF 4029 NW 33rd ST, OKLAHOMA CITY, OKLAHOMA

12. On or about March 8, 2018, William executed a Quit Claim Deed conveying the Property to Timothy, for the sum of \$10.00. Exhibit 2, *Quit Claim Deed dated March 8, 2018*. William's transfer was with knowledge of the United States' judgment and the transfer occurred merely three days after the Court entered its Amended Judgment in a Criminal Case in *US v Gum*.

THE FAIR DEBT COLLECTION PROCEDURES ACT

13. The FDCPA provides the exclusive civil procedures for the United States to recover a judgment on a debt. 28 U.S.C. § 3001.

14. The FDCPA provides that the United States may obtain avoidance of a transfer or obligation, a remedy under the FDCPA against the transferred asset, or any other relief the circumstances require when a transfer is fraudulent as to a debt to the United States. 28 U.S.C. § 3306(a).

15. Pursuant to the FDCPA, a transfer is fraudulent as to a debt to the United States which arises before the transfer is made if “the debtor makes the transfer or incurs the obligation without receiving a reasonably equivalent value in exchange for the transfer or obligation; and the debtor is insolvent at that time or the debtor becomes insolvent as a result of the transfer.” 28 U.S.C. § 3304(a)(1).

16. Pursuant to the FDCPA:

a transfer made or obligation incurred by a debtor is fraudulent as to a debt to the United States, whether such debt arises before or after the transfer is made or the obligation is incurred, if the debtor makes the transfer or incurs the obligation—

- (A) with actual intent to hinder, delay, or defraud a creditor; or
- (B) without receiving a reasonably equivalent value in exchange for the transfer or obligation if the debtor –

...

- (ii) intended to incur, or believed or reasonably should have

believe that he would incur, debts beyond his ability to pay as they became due.

28 U.S.C. § 3304(b)(1).

17. Under the FDCA, the Amended Judgment in a Criminal Case described in Paragraph 8 against William M. Baker and in favor of the United States is a debt arising before the transfer of the Property. 28 U.S.C. § 3002(3).

18. The United States is a creditor of William M. Baker, as defined by 28 U.S.C. § 3301(4).

**ACTUAL AND CONSTRUCTIVE FRAUD
UNDER THE FDCPA**
28 U.S.C. §§ 3304(b)(1)(A), (B) and 3306

19. The transfer described in Paragraph 12 was fraudulent to the United States in that the transfer was with actual intent to hinder, delay, or defraud a debt to the United States. 28 U.S.C. § 3304(b)(1)(A) and (B).

20. The transfer was to an insider, who is not a good faith purchaser for a fair market value.

21. Before the transfer, a judgment had been entered against William.

22. William made the transfer without receiving reasonably equivalent value in exchange for the transfer, and it was made shortly after he incurred a substantial debt.

23. William executed a Quit Claim Deed conveying the Property to Timothy, his brother, for \$10.00 on March 8, 2018, despite having knowledge of the United States' filing, or at the very least impending filing of the judgment.

24. William was insolvent after the transfer was made and the obligation was incurred.

PRAYER FOR RELIEF

WHEREFORE, the United States respectfully prays that judgment be entered in favor of the United States and against the Defendants, William Martin Baker and Timothy Alan Baker for actual and constructive fraud pursuant to the Federal Debt Collection Procedures Act; and judgment in favor of the United States, and against Defendant, William Martin Baker, Timothy Alan Baker and KB Freedom Properties, L.L.C. avoiding the fraudulent transfer of the Property to Timothy Alan Baker; for all costs and attorneys' fees of this civil action; and for such other and further relief as this Court deems just and equitable.

Dated August 22, 2018.

Respectfully submitted,
ROBERT J. TROESTER
First Assistant U.S. Attorney

/s/ Kay Sewell
KAY SEWELL OBA #10778
Western District of Oklahoma
210 Park Ave., Suite 400
Oklahoma City, OK 73102
(405) 553-8700 (Office)
(405) 553-8885 (Fax)

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA

v.

William M Baker

Date of Original Judgment: 2/6/2018
(Or Date of Last Amended Judgment)**Reason for Amendment:**

- Correction of Sentence on Remand (18 U.S.C. 3742(f)(1) and (2))
 Reduction of Sentence for Changed Circumstances (Fed. R. Crim. P. 35(b))
 Correction of Sentence by Sentencing Court (Fed. R. Crim. P. 35(a))
 Correction of Sentence for Clerical Mistake (Fed. R. Crim. P. 36)
-)) Modification of Supervision Conditions (18 U.S.C. §§ 3563(c) or 3583(e))
)) Modification of Imposed Term of Imprisonment for Extraordinary and
)) Compelling Reasons (18 U.S.C. § 3582(c)(1))
)) Modification of Imposed Term of Imprisonment for Retroactive Amendment(s)
)) to the Sentencing Guidelines (18 U.S.C. § 3582(c)(2))
)) Direct Motion to District Court Pursuant to 28 U.S.C. § 2255 or
)) 18 U.S.C. § 3559(c)(7)
) Modification of Restitution Order (18 U.S.C. § 3664)

THE DEFENDANT:

- pleaded guilty to count(s) 1 of the Superseding Indictment filed on January 6, 2016.
 pleaded nolo contendere to count(s) _____ which was accepted by the court.
 was found guilty on count(s) _____ after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

Title & Section	Nature of Offense	Offense Ended	Count
18 U.S.C. § 1594(c)	Conspiracy to sex traffic a child	10/27/2014	1

The defendant is sentenced as provided in pages 2 through 7 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

- The defendant has been found not guilty on count(s) _____
 Count(s) 1&4 of Indictment and Count 3 of is are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

February 21, 2018
Date of Imposition of Judgment


 ROBIN J. CAUTHRON
 United States District Judge

March 5, 2018

Date Signed



DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of: 24 months.

- The court makes the following recommendations to the Bureau of Prisons:
That the defendant, if eligible, participate in the Inmate Financial Responsibility Program at a rate determined by Bureau of Prisons staff in accordance with the requirements of the Inmate Financial Responsibility Program;
That the defendant participate in a sex offender treatment program while incarcerated; and
That the defendant be confined in an appropriate medical facility as close to Oklahoma City, Oklahoma, as possible.
- The defendant is remanded to the custody of the United States Marshal.
- The defendant shall surrender to the United States Marshal for this district:
 - at _____ a.m. p.m. on _____ .
 - as notified by the United States Marshal.
- The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:
 - Between March
 - 13 and March 27
 - by the USMS _____
 - as notified by the United States Marshal.
 - as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on _____ to _____
at _____ with a certified copy of this judgment.

UNITED STATES MARSHAL

By _____
DEPUTY UNITED STATES MARSHAL

DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of: Five (5) years.

MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
 The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4. You must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5. You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6. You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7. You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the risk and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the risk.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: www.uscourts.gov.

Defendant's Signature _____

Date _____

DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

SPECIAL CONDITIONS OF SUPERVISION

The defendant shall submit to a sex offender mental health assessment and a program of sex offender mental health treatment, as directed by the U.S. Probation Officer, until such time as the defendant is released from the program by the probation officer. This assessment and treatment may include a polygraph to assist in planning and case monitoring. The defendant may be required to contribute to the cost of services rendered (copayment) in an amount to be determined by the probation officer, based on the defendant's ability to pay. Any refusal to submit to such assessment or tests as scheduled is a violation of the conditions of supervision.

The defendant shall register pursuant to the provisions of the Sex Offender Registration and Notification Act, or any applicable state registration law. The defendant shall submit his person, and any property, house, residence, vehicle, papers, computer, other electronic communication or data storage devices or media, and effects to search at any time, with or without a warrant, by any law enforcement or probation officer with reasonable suspicion concerning a violation of a condition of probation or unlawful conduct by the person, and by any probation officer in the lawful discharge of the officer's supervision functions.

The defendant shall have no contact, directly or indirectly, with any and all victims of the offense.

The defendant shall not be associated with children under the age of 18, unless approved by the U.S. Probation Officer.

The defendant must submit to a search of his person, property, electronic devices, or any automobile under his control to be conducted in a reasonable manner and at a reasonable time, for the purpose of detecting evidence of sex trafficking activities at the direction of the probation officer upon reasonable suspicion. Further, the defendant must inform any residents that the premises may be subject to a search.

The defendant shall participate in a program of mental health aftercare at the direction of the probation officer. The court may order that the defendant contribute to the cost of services rendered (copayment) in an amount to be determined by the probation officer based on the defendant's ability to pay.

DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

CRIMINAL MONETARY PENALTIES

The defendant must pay the following total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>JVTA Assessment*</u>	<u>Fine</u>	<u>Restitution</u>
TOTALS	\$ 100.00	\$ 0.00	\$ 0.00	\$ 635,247.00

- The determination of restitution is deferred until _____. An *Amended Judgment in a Criminal Case* (AO 245C) will be entered after such determination.
- The defendant shall make restitution (including community restitution) payments to the U.S. Court Clerk, 200 N.W. 4th Street, Oklahoma City, OK 73102, to be distributed to the payees in the amounts listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

- Individual names omitted. See list in Court Clerk's Office.

<u>Name of Payee</u>	<u>Total Loss**</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
		\$635,247.00	

TOTALS	\$ 0.00	\$ 635,247.00	
---------------	---------	---------------	--

- Restitution amount ordered pursuant to plea agreement \$ _____
- The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).
- The court determined that the defendant does not have the ability to pay interest, and it is ordered that:
- the interest requirement is waived for fine restitution.
- the interest requirement for the fine restitution is modified as follows:

* Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.

** Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: William M Baker
CASE NUMBER: 15CR00126-003-C

SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties shall be due as follows:

- A Lump sum payment of \$ 635,347.00 due immediately, balance due
 - not later than _____, or
 - in accordance with C, D, E, or F below; or
- B Payment to begin immediately (may be combined with C, D, or F below); or
- C Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after the date of this judgment; or
- D Payment in equal _____ (e.g., weekly, monthly, quarterly) installments of \$ _____ over a period of _____ (e.g., months or years), to commence _____ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E Payment during the term of supervised release will commence within _____ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F Special instructions regarding the payment of criminal monetary penalties:
If restitution is not paid immediately, the defendant shall make payments of 10% of the defendant's quarterly earnings during the term of imprisonment.

After release from confinement, if restitution is not paid immediately, the defendant shall make payments of the greater of \$100.00 per month or 10% of defendant's gross monthly income, as directed by the probation officer. Payments are to commence not later than 30 days after release from confinement.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

- Joint and Several

Co-Defendant Names and Case Numbers (*including defendant number*), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

William M Baker	15CR00126-3	\$635,247.00
Maurice Morlee Johnson	14CR00342-1	\$635,247.00
Tonya Gay Gum	15CR00126-1	\$635,247.00
Trung N Duong	15CR00126-2	\$635,247.00
Curtis A Anthony	15CR00126-5	\$635,247.00

- The defendant shall pay the cost of prosecution.
- The defendant shall pay the following court cost(s):
- The defendant shall forfeit the defendant's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) JVTA assessment, (8) penalties, and (9) costs, including cost of prosecution and court costs.

Timothy Alan Baker
4029 NW 33rd Street
Oklahoma City, Ok 73112

QUIT CLAIM DEED
INDIVIDUAL FORM

22180380010306100
03/08/2018 12:16:46 PM
Bk:RE13677 Pg:514 Pg:1/1 DEED
State of Oklahoma
County of Oklahoma
Oklahoma County Clerk
David B. Hooten

THIS INDENTURE, Made this 8 day of March, 2018 between
William Martin Baker, Single
and Timothy Alan Baker, Single

of the second part, Witnesseth, that said party y of the first part, in consideration of the sum of:
Ten & No/100 DOLLARS to
him in hand paid, the receipt of which is hereby acknowledged, do es hereby quitclaim, grant,
bargain, sell and convey unto the said party of the second part all his right, title, interest, estate, and
every claim and demand, both at law and in equity, in and to all the following described property situate in
Oklahoma County, State of Oklahoma, to wit:

Lot Eight (8), Block Four (4), L.L. LYON SKYLINE VIEW ADDITION, Oklahoma City,
Oklahoma County, Oklahoma, according to the recorded plat thereof, LESS AND EXCEPT
one-half (1/2) interest in and to all of the oil, gas and other minerals in and under and that
may be produced from said premises which have previously been conveyed, also known as
4029 NW 33rd Street, Oklahoma City, Oklahoma 73112-3351;

Exempt Documentary Stamp Tax
CB Title 58
Article 32 Section 3201 or 3202,
Paragraph 4

PID#: R113650610

Together with all and singular the hereditaments and appurtenances thereunto belonging.

To Have and to Hold the above described premises unto the said parties of the second part, and to
the heirs and assigns of the survivor forever, so that neither the said party y of the first part or any
person in his name and behalf, shall or will hereafter claim or demand any right or title to the
said premises or any part thereof; but they and everyone of them shall by these presents be excluded and
forever barred.

In Witness Whereof, the said party y of the first part has set his
hand the day and year first above written.

William Martin Baker

STATE OF OKLAHOMA
COUNTY OF Oklahoma } ss:

INDIVIDUAL ACKNOWLEDGEMENT
OKLAHOMA FORM

Before me, the undersigned, a Notary Public in and for said County and State on this 8th day of
March, 2018, personally appeared William Martin Baker

to me known to be the identical person who executed the within and foregoing instrument and acknowledged
to me that he executed the same as his free and voluntary act and deed for the uses and
purposes therein set forth.

Given under my hand and seal the day and year last above written
MY COMMISSION EXPIRES: _____



20180380010306100
Filing Fee: \$13.00

03/08/2018 12:16:46 PM
DEED



CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)**DEFENDANTS**

William Martin Baker, Timothy Alan Baker, KB Freedom Properties, L.L.C.

County of Residence of First Listed Defendant Greene Co., MO
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Kay Sewell, Assistant U.S. Attorney, OBA #10778
210 Park Ave., Ste. 400, Oklahoma City, OK 73102 (405) 553-8700**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- | | |
|---|---|
| <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question
(U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input type="checkbox"/> 4 Diversity
(Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 425 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability		<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 386 Property Damage Product Liability		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 480 Consumer Credit	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Management Relations	<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 850 Securities/Commodities/ Exchange	
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 890 Other Statutory Actions	
	CIVIL RIGHTS	Habeas Corpus:	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 891 Agricultural Acts
	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 893 Environmental Matters
	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 895 Freedom of Information Act
	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General	<input type="checkbox"/> 864 SSID Title XVI	
	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 865 RSI (405(g))	
	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	Other:		
	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 462 Naturalization Application	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 465 Other Immigration Actions	
		<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		
			IMMIGRATION	
			<input type="checkbox"/> 462 Naturalization Application	
			<input type="checkbox"/> 465 Other Immigration Actions	
			FEDERAL TAX SUITS	
			<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 896 Arbitration
			<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | | |
|---|---|--|---|--|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) _____ | <input type="checkbox"/> 6 Multidistrict Litigation - Transfer | <input type="checkbox"/> 8 Multidistrict Litigation - Direct File |
|---|---|--|---|--|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §3001, et seq.**VI. CAUSE OF ACTION**Brief description of cause:
fraudulent conveyance of real property.**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.**DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

08/22/2018

FOR OFFICE USE ONLY

SIGNATURE OF ATTORNEY OF RECORD

ts/ Kay Sewell

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE